
Illinois Commerce Commission On its Own Motion)	
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Investigation Concerning Illinois Bell Telephone)	Docket no. 01-0662
Company's compliance with Section 271 of the)	
Telecommunications Act of 1996)	

AFFIDAVIT OF MARCI SCHROLL

9-1-1 PROGRAM MANAGER

TELECOMMUNICATIONS DIVISION

ILLINOIS COMMERCE DIVISION

Dated: February 21, 2003

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I. INTRODUCTION

I, Marci Schroll, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Marci Schroll. I am employed by the Illinois Commerce Commission as the 9-1-1 Program Manager for the Telecommunications Division. My business address is 527 East Capitol Avenue, Springfield, Illinois 62701.

II. EDUCATION AND BACKGROUND

2. I graduated from Illinois State University in June 1986 with a bachelor's degree in Consumer Services and a minor in Public Relations. I began my employment with the Illinois Commerce Commission in November 1987 as a Consumer Counselor. My responsibilities as a counselor included mediating consumer complaints regarding regulated utility matters as well as enforcing and educating the public and regulated entities of the Commission's rules and regulations. In addition to my responsibilities as a counselor, I was responsible for program development and implementation of the Telephone Assistance Program. In March of 1993, I was appointed as the Staff Liaison to the Telephone Assistance Programs by the Executive Director of the Illinois Commerce Commission. As Staff Liaison, I oversaw activities of the Universal Telephone Assistance Corporation to ensure that it met all requirements of the Lifeline Connection Assistance Program and the Universal Telephone Service Assistance Program as required in Sections 13-301 and 13-301.1 of the Public Utilities Act (PUA).
3. In July of 1995 I moved to the 9-1-1 Program, which at the time was a part of the Consumer Service Division of the Commission. As the 9-1-1 Program

Assistant, I was responsible for the project implementation of municipal and county wide 9-1-1 systems.

4. In August of 2002, I was promoted to the 9-1-1 Program Manager for the Telecommunications Division of the Commission. I am currently responsible for overseeing the formation, implementation and maintenance of landline and wireless 9-1-1 systems throughout the State of Illinois. As the 9-1-1 Program Manager, I have been responsible for ensuring that the telecommunication carriers, local governments, business communities and schools fulfill their obligations under state regulations and statutory requirements for the provisioning of 9-1-1 service, as well as educating these entities of any existing or new 9-1-1 requirements. Finally, I promote and assist in the development of policy and legislative proposals that affect current and future 9-1-1 issues.

III. PURPOSE OF TESTIMONY

5. The purpose of my testimony is to evaluate whether SBC/Ameritech (the Company) is meeting its obligations under Check List Item # 7 to offer nondiscriminatory access to 9-1-1 and E9-1-1 services. Specific performance measures (PMs) were established for 9-1-1 and E-9-1-1 services and will be used as the basis for my evaluation of whether the Company has adequately met the requirements for this check list item. Accordingly, Staff has reviewed and analyzed the results of the Company's following performance measurements; PM 102 - Average time to clear errors during the processing of the 911 database (UNE loop and port combination orders), PM 103 -

Percent accuracy for 911 database (facilities based carriers), PM 104 -
Average time required to update 911 database (facilities based carrier).

IV. ANALYSIS AND CONCLUSION

6. There are a total of three performance measures related to 9-1-1 and E-9-1-1 services. Staff's review of PMs 102, 103 and 104 are contained in Attachment 1 to this affidavit. After reviewing the performance measurement results, Staff concludes as follows:

PM 102 - Passed

7. The analysis concludes that the Company was able to successfully clear errors in the 9-1-1 database at the parity standard in each month of the study period.

PM 103 – Neither passed nor failed due to insufficient data

8. No data was available to support whether the Company could maintain the same percentage of accuracy in the 9-1-1 database for its competitors as it has for itself. Staff questioned why there was no supporting data for this PM and requested an explanation from Mr. Ehr, SBC's witness concerning this issue. Mr. Ehr, stated at the hearing on Tuesday February 11, 2003 (Tr. at 3054) that the business rule for PM 103 provides that the activity that's measured is initiated by the facilities-based CLEC requesting a reconciliation file, so that the CLEC can reconcile the accuracy of the updates to the 9-1-1 database. However, no CLEC has engaged in this process during the study period, so there is no activity to report.

9. Staff has reviewed the business rule and understands that the process would require the CLEC to request a compare file so as to compare its own customer record information in order to determine the validity of the Company's 9-1-1 database record. Since no CLEC's have requested this information, there is no data available to determine a percentage of database accuracy.

PM 104 - Failed

10. Staff is concerned that the Company was unable to meet the parity standard for average time to update the 9-1-1 database and to unlock the 9-1-1 database records. Based on information available to Staff on the Company's web site, SBC's inability to achieve parity for this performance measure on a consistent basis has persisted since at least January of 2002. The longer the delay in updating the database, the greater the chance that an incorrect phone number and address could be forwarded during a 9-1-1 call, thus creating a greater possibility of loss of life and property.
11. In his January 17, 2003, Affidavit, SBC Illinois witness Mr. Jim Ehr testified that the difference in SBC Illinois' retail and CLEC performance was not material, amounting to a difference in average time to update the 9-1-1 database of 14 minutes in September and 24 minutes in November. Ehr Affidavit at para. 192. Mr. Ehr also testified in his affidavit the "[t]he reason for any difference between the results for SBC Illinois' retail updates and the CLEC updates can be attributed to two factors outside the control of SBC Illinois: the size of the CLEC update files and the quality of the CLEC update file records." Ehr Affidavit at para. 193. Mr. Ehr also testified that the industry standard for timeliness of 9-1-1 database updates established by the National Emergency Number Association (NENA) is within 24 hours of receipt, and

that SBC is processing update files for both its own updates and CLEC updates within this standard. Staff sought further clarification at the hearings of SBC's "reasons" for not achieving parity, and Mr. Ehr indicated that he would need to respond in writing to provide any information beyond what was in his affidavit. Tr. at 3056-3059. In Mr. Ehr's Resonse to the 2/11/2003 Hearing Questions Directed to James Ehr, he indicated that two factors "could cause CLEC files to take longer to process on average." Mr. Ehr's written response further indicated that these factors were (1) that CLEC files generally contain more errors than SBC files (and errors require additional processing time) and (2) that CLECs submit nearly four times as many 911 update files as submitted by SBC (which results in a greater probability for CLECs to experience a wait situation while in the processing queue).

12. Staff is also familiar with the NENA standard and would agree that updates that are completed within the 24 hour time frame would meet the national standard and adequately address public health and safety concerns. Although the average update times for SBC Illinois' retail updates and the CLEC updates are less than the 24 hour NENA standard, it is not clear from information provided to date whether all individual updates have met this standard. SBC should provide this information in its rebuttal affidavits. It is also unclear why the larger number of CLEC updates would cause CLECs to experience greater average update times. SBC should provide this information in its rebuttal affidavits. The Commission needs to ensure that the Company's updates to the 9-1-1 database are being made in a timely fashion for its competitors as well as for itself. The additional information specified above will assist in making such a determination.

VI. Recommendation

13. Obviously, 9-1-1 services are required services and are extremely important to the public health, safety and welfare. The Company's provisioning of 9-1-1 services should not be found sufficient unless the Company can confirm that all individual updates meet the 24 hour NEMA standard. In addition, the Company should be expected to act prudently with every 9-1-1 update and error correction, whether it is for the Company's customers or for CLECs' customers. Out of the three 9-1-1 PMs, Staff has determined that SBC did not meet the parity standard in PM 104. SBC's representation that CLEC update files generally contain more errors than SBC update files partially explains the average update time discrepancy. Further explanation of why the larger number of CLEC updates would cause CLECs to experience greater average update times may further explain the discrepancy for PM 104. However, the Company's explanation leads to the conclusion that parity will never be achieved and that the current result is not an anomaly. Thus, in addition to the above-described information, I also recommend that SBC explain why and/or how it will comply with PM 104 on a going forward basis. For example, has SBC taken reasonable steps to address the factors causing SBC to fail PM 104 – such as informing CLECs of the errors in their update files. If SBC's position is that there is nothing that can be done to remedy its current performance with respect to PM 104, then SBC should provide a proposal for a reasonable alternative to measure and track this 911 service.